

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

JOHN (JACK) ANGELLO,) CIVIL ACTION NO. 03-0014
)
Plaintiff,)
)
v.)
)
NORTHERN MARIANAS COLLEGE,)
)
Defendants.)

1/14/05 8:20m
jud

DEPOSITION OF JOHN (JACK) ANGELLO

Taken at the
Law Offices of Vicente T. Salas
2nd Floor, UIU Building
San Jose, Saipan
Commonwealth of the Northern Mariana Islands

September 30 and October 5, 2004

Transcribed by:
JUDICIAL SERVICES, PLUS
2nd Floor, Sablan Bldg., Chalan Piao
P. O. Box 500051
Saipan, MP 96950-0051
(670) 235-7585

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

JOHN (JACK) ANGELLO,)	CIVIL ACTION NO. 03-0014
)	
Plaintiff,)	
)	
v.)	
)	
NORTHERN MARIANAS COLLEGE,)	
)	
Defendant.)	
_____)	

On the 30th day of September, 2004, at the Law Offices of
Vicente T. Salas, 2nd Floor, UIU Building, San Jose,
Saipan, Commonwealth of the Northern Mariana Islands,
personally appeared,

JOHN (JACK) ANGELLO

who was, by a Notary Public, sworn and thereupon examined
as a witness in said cause.

APPEARANCES:

For the plaintiff:	Danilo T. Aguilar, Esq.
For the defendants:	F. Matthew Smith, Esq.
Notary Public:	Ms. Judi Fujihira

Table of Contents

Direct examination (Smith).....Page 4

E X H I B I T S:

- A - Letter dated December 7, 1999 re: EEOC Charge #37890336 and November 12, 1999 memo re recommendation for settlement - grievance for Jack Angello [4 pp.];
- B - Qualification evaluation worksheet.

1 SAIPAN, COMMONWEALTH OF THE N. MARIANA ISLANDS

2 September 30, 2004

3 MR. SMITH: Okay, today's date is September 30th,
4 2004, this is the deposition of Dr. John, Jack Angello,
5 plaintiff, in the case of Angello versus NMC, Northern
6 Marianas College, this is the Northern -- in the United
7 States District Court for the Northern Mariana Islands,
8 Civil Action No. 03-0014.

9 Present today is Matthew Smith, that's me, on behalf
10 of the defendant, Northern Marianas College. Will the
11 others announce your--

12 MR. AGUILAR: Dan Aguilar appearing as attorney for
13 Jack Angello.

14 MR. ANGELO: Jack Angelo, plaintiff in this matter.

15 MR. SMITH: Okay, we will now -- ah, the time is
16 11:12, according to my watch, a.m., and the plaintiff or
17 Mr. Angello will now be sworn in by a Notary.

18 MS. FUJIHIRA: Please raise your right hand and
19 state your -- right hand and state your full name.

20 WITNESS: John Anthony Angello.

21 ...[Oath administered].

22 WITNESS: So help me God, I do.

23 MS. FUJIHIRA: Thank you.

24 MR. SMITH: Okay, thank you, Judi. All right, the
25 deposition can proceed.

1 DIRECT EXAMINATION

2 BY MR. SMITH:

3 Q Mr. Angello, have you ever had your deposition taken
4 before?

5 A Yes, um, around 1993, '94 by U.S. Department of
6 Justice.

7 MR. SMITH: Okay.

8 A I was a, ah witness to the case of PSS and the
9 Filipino workers.

10 Q Okay, you're familiar with how these depositions
11 work?

12 A Pretty much.

13 Q Okay, you know that you are under oath and, ah are
14 expected to answer these questions, unless your
15 attorney makes some sort of objection or asks you
16 not to. Actually, if he makes an objection, still
17 you're suppose to answer the question, only if he
18 instructs you not to answer, um where we take up
19 that issue.

20 A Sure.

21 Q But ah, if you do need to break at all, got to use
22 the restroom, get a drink of water, whatever, feel
23 free to ask, we can pause this as needed to address
24 all of those things um, and of importance is saying
25 yes or no instead of nodding, because all this is

1 being recorded and if we're not careful, then we'll
2 miss out on some of those responses if the -- if the
3 answers are not clear. Do you have any questions
4 for me before we start?

5 A Not at this time.

6 Q Okay. Can you please state again your full name,
7 for the record?

8 A John Anthony Angello, also known as my nickname
9 Jack.

10 Q Okay, I'd like to start with a little of your
11 educational background? Can you please tell me what
12 is your -- give me a list of your educational
13 background, what colleges you have attended?

14 A Colleges ah, that I've attended and received
15 degrees? Peers (ph.) Junior College in Los Angeles,
16 I received an AA Degree in liberal--

17 Q What was that AA Degree in?

18 A In just, ah general academics, liberal, I believe
19 they refer to it as liberal arts.

20 Q What year was that you received that?

21 A 1970.

22 MR. SMITH: Okay.

23 A I received a B.A., Bachelor of Arts in
24 Communications, minor in psychology from San Diego
25 State University in 1970. I received a masters--

1 Q Wait, you received -- so you got your AA and your BA
2 the same year?

3 A The same year.

4 Q How did you do that?

5 A I fulfilled a requirement, I was lacking one
6 requirement, ah for my AA and I took a course that
7 both was accepted by the college, ah San Diego State
8 University and then I transferred that credit to
9 Peers and then at that point, they issued me an AA
10 degree.

11 Q Okay, and that was no -- at SDS you had no problem
12 with that? San Diego State?

13 A No.

14 MR. SMITH: Okay.

15 A Then in 1986, I believe ah would be the date -- no
16 excuse me, that would be 1989, I believe it was '89,
17 '88 or '89 I received a masters of art in
18 instructional technology from San Jose State
19 University. And then, in 1996 I was issued a
20 Doctorate Degree in education with an emphasis in
21 instructional technology, it's an administrative
22 course work from University of Southern California.

23 Q U.S.C.?

24 A U.S.C.

25 Q Did you do that, ah work at U.S.C.?

1 A Ah it was a cooperative program with San Jose State
2 University and U.S.C., and I attended ah, on campus
3 both at San Jose State University and U.S.C.

4 Q Okay, were you living in 1996 in California?

5 A 1994 a part and 5 and ah, the first -- early part of
6 1996 I lived in California.

7 Q Okay. Are these -- have you attended any other
8 colleges where you did not get a degree?

9 A Ah, I attended Washington State University on
10 scholarship, football scholarship, in 1964 and I was
11 um -- had a severe neck injury in the Fall of '64 on
12 the freshman team and it was advisable that I stop
13 playing football and I donated my scholarship to a
14 deserving student on campus. I had a full right
15 even with an injury clause.

16 Q Wow. What position did you play?

17 A I played tight end, but they moved me out to, ah
18 split end and then wide receiver and then also
19 punting.

20 Q Wow. So, you donated your scholarship?

21 A Well, I explained to them that -- they told me that
22 I could continue on with school there four years and
23 at the time, um I felt, ah I wasn't playing
24 football, I wasn't earning my scholarship, I guess
25 maybe idealistic, so I asked them to, ah give it to

1 any deserving low income student.

2 Q And, ah -- and they did?

3 A I don't know exactly after that. I left and went
4 back to Southern California and resumed ah -- oh,
5 excuse me, that college would be University of
6 California at North Ridge ah, where I went back and
7 started school again, ah and played basketball for
8 them and then, ah transferred to San Diego State
9 University.

10 Q Okay, but how -- where did Peers Junior College come
11 into this?

12 A I was -- I had a, um girlfriend at the time and she
13 -- I was encouraging her to go to college and I
14 basically joined with her to keep her company at the
15 beginning of her, ah junior college career and, in
16 doing so, I accumulated enough credits, I didn't go
17 there the full two years, I accumulated ah, the
18 minimum to get an AA with transferrable credits from
19 my Cal State and it just happened the summer of 1970
20 everything came together that I had -- I was taking
21 a course at Peers College, that was I was attending
22 Peers College, transferred to San Diego State
23 because I needed one course, ah in the lower general
24 requirements, and they said at that point I could
25 graduate from Peers. It was sort of unique the fact

1 that I graduated from both places about the same
2 time.

3 Q Yeah. You said Cal State, what school do you refer
4 to when you refer to Cal State?

5 A The university system in California, ah they have
6 ah, the University of California North Ridge--

7 Q That's your North Ridge -- that's what you -- you
8 were talking about North Ridge when you....

9 A Right.

10 Q said Cal State?

11 A Yeah.

12 MR. SMITH: Okay.

13 A It was referred to at one time as Cal State, then
14 they changed, even San Diego State became a part of
15 the California State university system.

16 Q Okay. So, you left Washington State, basically
17 because of your injury and to go back home, is that?

18 A Yes.

19 Q Okay, um had you done any college study prior to --
20 was Washington State the first--

21 A Yes. I graduated from High School in 1964.

22 MR. SMITH: Okay.

23 A June. And attended in the Fall Washington State.

24 Q Okay, very good. Um how -- how did your educational
25 background qualify you for your employment in NMC?

1 A At the time, when I applied, it was in 1996, um--

2 Q The first you time you applied to NMC?

3 A No, I -- when I was in Tinian I was the principal of
4 ah, Tinian High School in 1990 -- 1999 -- 1990 --
5 1992. I applied as an English instructor and I was
6 accepted and taught English for NMC ah, part time on
7 Tinian on the Tinian Campus in 1992. Ah, and I've
8 known -- I knew Agnes for many, many years and she
9 followed my educational career and then I, ah -- ah
10 from Tinian High School I applied for my doctorate
11 program, based on my work at Tinian High School I
12 was accepted and, ah attended college and university
13 in California. Received my doctorate in June or
14 January, February of 1996, came back to Saipan and
15 then applied ah, at the college ah, somewhere around
16 April? About that time frame? And, I was called
17 in, I believe in May for an interview for the
18 director of apprenticeship programs, that's how they
19 referred to it, it basically covered the vocational
20 programs. Ed Klingbergs (ph.) was the Dean at the
21 time and he knew of my background in education, but
22 also my background in construction and in trades. I
23 had several jobs and quite a very big background
24 experience, so he basically interviewed and asked if
25 I could handle this program and try to bring it up

1 to a higher level, try to get the apprenticeship
2 program going, the adult school, and two plus two
3 programs and I said I'd give my best shot, they
4 hired me, and I started in June of 1996.

5 Q So um, it was as a result of both your education and
6 your experience that enabled you to qualify for an
7 NMC job, is that what you're saying?

8 A Yes.

9 Q Um, is that--

10 A Because the vocational programs require a background
11 in trades.

12 Q And, that was -- that was the position you were
13 applying for?

14 A Yes.

15 Q Okay, getting into some of this background, you say
16 you had construction background?

17 A Yes.

18 Q When -- when -- what kind of construction background
19 did you have?

20 A My father was a contractor in California and from
21 the age 5 up to approximately ah, 18, 19? I worked
22 summers for my father and after eight -- when I was
23 about 20, ah he gave me his dump truck and some
24 tools and I, ah created a company called Creative
25 Construction Company and did, ah residential--

1 Q Creative Construction?

2 A Right.

3 Q Was this actually a corporation? Or was it just a--

4 A Just a company.

5 Q Just a sole prop -- you were just--

6 A Right.

7 Q Your company--

8 A Right, proprietor. Sole proprietor.

9 Q And, what did you do?

10 A I did residential work, ah concrete, most of them
11 concrete, driveways, sidewalks, some remodeling
12 work, renovation work on homes.

13 Q Now, this is when you were 20, so where were you at
14 this time, you were....

15 A California.

16 Qgoing to school at this time, right?

17 A Yeah, I would do the, ah work on weekends and off
18 hours.

19 Q Okay, ah -- okay, and any additional background in
20 trades besides this, ah family--

21 A I designed and had a, ah speed boat patent pending,
22 hydro--

23 Q Still patent pending today?

24 A I believe it expired.

25 MR. SMITH: Okay.

1 A And designed a, ah speed boat. It was a unique
2 shape and built, created a company and built two, ah
3 prototype and two models and, ah I had sales lined
4 up, but the oil crises of 1970 something, killed my
5 -- pretty much killed the product because it raised
6 the price up too high. And then I was a publisher,
7 um and the, ah--

8 Q What did you publish?

9 A Other people's, just you know basically grassroots
10 publishing house.

11 Q Meaning you just photocopied it or?

12 A Poetry, yeah, and bound together and just -- and I
13 had my own work ah, published and bound and put in
14 stores for sale.

15 MR. SMITH: Oh, really.

16 A Yes.

17 Q What kind of work was yours?

18 A Poetry.

19 Q Poetry. Um what kind of stores did you get it in
20 to?

21 A A lot of like mom and pop, not in any major stores.

22 Q But you did these others as well?

23 A Ah yes.

24 Q Was this while you were at school?

25 A Ah this is during the time I finished, after San

1 Diego State, it would be in the years of, ah '71
2 through '75.

3 MR. SMITH: Okay, that's kind of cool.

4 A And also, I wrote screen plays with a partner of
5 mine. Starting out in Hollywood and she went on to
6 be very successful. Ah I eventually moved out here
7 to the islands.

8 Q Who -- who was that?

9 A Catherine Green.

10 Q What did she go on to do?

11 A She, ah first was picked up by Taxi and became a
12 stable writer, they call it, and then, ah she also
13 was hired by Bob Hope to be one of his writers and
14 then eventually she, ah was executive producer of
15 Married with Children.

16 MR. SMITH: Wow!

17 A And then ah, now she's just doing creating pilots I
18 guess and, ah--

19 Q Do you keep in touch with her still?

20 A Yes. She's still waiting for me to finish my screen
21 play that I started back then.
22 ...[laughter].

23 A Sort of running joke, I'm on page 7 now.

24 Q What kind of screen plays did you write with her?

25 A Ah we wrote -- she liked, ah romantic comedies? And

1 I was in SciFi and so, ah I basically helped with
2 her stories and then I came out here to finish off
3 my SciFi ah, saga which ah--

4 Q How did you meet her, was she a childhood friend?

5 A Well, I lived by Burbank, ah Warner Brothers Studio,
6 she came out from Oklahoma with a dream of becoming
7 a, you know a writer in Hollywood and I sort of
8 helped her when she started out. She was a little
9 bit low in the coin, so I financially helped her and
10 became a friend and ah, support and one day when --
11 and I was sort of struggling too, one day she walked
12 in and said, ah guess who I'm working for, and I
13 went, I don't know, she turned on the television and
14 there she was, she taped her earlier because Bob
15 Hope did these specials and, ah she's driving up in
16 this car in Lake Tahoe and he's in the car and he
17 makes a remark about flirting with this lady in the
18 car and the camera pans over to her....

19 MR. SMITH: Oh, that's cool.

20 Aand I saw her and I went...[gesturing]. So, and
21 then ah, anyway she's been a real good friend and ah
22 -- ah and she helped when I was at the college, NMC,
23 with the film and TV for, ah if we would expand
24 possibly of ah, getting in touch with people to
25 bring them out.

1 Q So you contacted her over the Pacific Rim?

2 A She knew of it and she was happy that I started
3 because I told her before it started, I had this
4 dream of creating a film and TV program and then met
5 with Butch (ph.) one night and it turn out that we
6 were, like grew up in the same place and then it, ah
7 all started to click and the rest is history I
8 guess.

9 Q So, when you interviewed in June of 1996, did you
10 raise all of these matters with them at that time?
11 I mean did this come up, did you talk trade or
12 vocational education?

13 A Well, Mr. Klingbergs knew of my background from PSS
14 that I, ah had gone in, especially Tinian High
15 School because I went in and basically renovated the
16 entire high school ah, physically, the physical
17 plant, and plus they only had ah, up to the 11th
18 grade and I created the 12th grade for the first
19 time and got the place accredited. Ah, so it was a
20 lot of hard work with the support of, ah the Tinian
21 people and staff, so he knew that he needed somebody
22 who would take action, do things?

23 And, he also knew that I would do things at
24 times, um you could possibly get into political
25 trouble, I guess if you want to call it that, but he

1 knew that I would always keep the students, it was
2 the bottom line, students at heart, so. And he had
3 these projects and he said they've been sitting
4 dormant and, ah he knew that I would accomplish what
5 he wanted me to do.

6 Q Let me ask you just with your last comment there
7 about he knew that you would do things even if they
8 weren't politically correct, how did he know that?

9 A From Tinian High School.

10 Q What ah -- what did he learn from Tinian High
11 School?

12 A There was a situation of ah, when I was principal
13 there that, ah we started an aviation program that
14 was ah, Board approved and then ah -- then I was um,
15 asked by the Tinian Delegation because everything
16 was seen to be running great, if I wanted to be
17 commissioner? And they proposed that--

18 Q Commissioner of?

19 A Education.

20 Q For the CNMI?

21 A Right. And that's what I meant by, you know
22 politically getting into a situation where the
23 Commissioner at that time didn't receive that very
24 well, and so, ah suddenly I was, ah not renewed. It
25 was a similar ah -- it was a matter of ah, without

1 cause situation and I challenged it and filed in
2 court and, ah eight years later, it was settled.

3 Q It took eight years to settle that?

4 A Yes.

5 Q How come it took so long?

6 A I was stubborn.

7 Q But it was settled to your satisfaction?

8 A Yes.

9 Q Um is that settlement public knowledge?

10 A Ah it -- it was public only to the people that put
11 together, you know the staff, put together the work
12 that I wouldn't -- I think there was a clause in
13 there about revealing, you know the ah--

14 Q Confidentiality?

15 A But ah -- confidentiality, but ah, it was known that
16 it was settled, both sides were satisfied.

17 Q Did ah -- did you represent yourself in that action?

18 A Yes.

19 Q So, he was aware that -- at the time that you were
20 hired in June of 1996, was this ongoing? This PSS
21 matter still ongoing?

22 A Yes.

23 Q Ah when was that resolved?

24 A It believe it was 1998.

25 MR. SMITH: '98, okay.

1 A Excuse me, in 1999. About 1999, something like
2 that.

3 Q Okay, at what level was that resolved?

4 A Um the EEOC brought in their mediation team? Ah,
5 and I, apparently my case qualified for that, and
6 they brought out a lady from San Francisco who met
7 with PSS and myself and, ah basically told PSS that
8 they would settle with me or she would take them to
9 court.

10 Q No, were you already in court? Or had you just
11 strictly stayed at the EEOC level?

12 A I was in court because I ah, had refiled ah -- EEOC
13 stepped in out of the blue because apparently they
14 had the right to step in because I did file in EEOC
15 and they gave me a right to sue, then I filed in
16 District Court.

17 Q Okay, so that was the order that you did, you got --
18 you first filed with the EEOC, then they gave you
19 the right to sue letter and you filed in District
20 Court?

21 A Yes.

22 MR. SMITH: Okay.

23 A Over the matter of, ah termination without cause.

24 Q And then ah--

25 A And discrimination.

1 Q And so when you settled, you settled the District
2 Court case? Is that how it worked? Or had that
3 case--

4 A We haven't--

5 Q Had that case already been tried and settled? Or
6 what -- what was the status of that District Court
7 at the time of the settlement?

8 A It was ah, in limbo. I think we were already, ah
9 moving on towards trial and then ah--

10 Q Okay, but it had not been tried yet?

11 A No, and EEOC had stepped in and, of course, I agreed
12 after the settlement to drop all, ah pending suits
13 and any future on that matter.

14 Q Did EEOC explain to you why they stepped in?

15 A Um would that be confidentiality, or?

16 MR. AGUILAR: I don't -- I don't think so. If you
17 know, then I don't think, I don't think it's....

18 A The lady--

19 MR. AGUILAR:the settlement, so--

20 MR. SMITH: ...[unintelligible].

21 A The lady, she was an attorney, and she said that ah
22 -- that my case had merit and that ah -- and then
23 she brought in PSS and explained to PSS that there
24 was merit, ah and I went on record saying, ah I
25 would like to settle this matter, ah in a amicable,

1 you know situation that would be, you know for both
2 sides because I was working at the college and I
3 said it'd drain on the resources, you know from the
4 high school or the PSS and she agreed and ah--

5 Q Why did she just enter the picture, had you
6 contacted her?

7 A No.

8 Q Did she ever explain to you why she came into the
9 picture?

10 A She followed the case ah, and then, ah I think this
11 was a new ah -- they started this, I think fairly
12 new -- this was a fairly new thing they were
13 starting, mediation? Um and then she went through,
14 I guess, files? Which ones would be, ah, and so
15 then I got a letter that she would be arriving on a
16 certain date and I was to appear at the ah,
17 Horiguchi Building, the Ombudsman in the back
18 together with PSS, so I appeared on the date that I
19 was asked to appear.

20 Q And, this new thing worked then in your case anyway?

21 A Yes.

22 Q It resulted in a settlement?

23 A Yes. And, like I said, she made it favorable for me
24 ah, in that she said she had gone over the documents
25 and that ah -- so, I was satisfied. And Louise

1 Concepcion who was acting commissioner at the time
2 she was satisfied, too. She was supportive of me
3 and being acting commissioner she said she wanted to
4 get it settled too, so do I.

5 Q Okay, with ah -- with this knowledge then of this
6 litigation with PSS and your knowledge of the trade
7 backgrounds or your trade experience um, as you
8 interviewed at NMC in 1996, what ah -- what did your
9 educational experience add to that. Did they look
10 for anything in particular in your educational
11 background? Or were they just looking for someone
12 with a masters or a doctorate degree or what --
13 what, do you recall? How your education helped you
14 with the hire? The original hire?

15 A They knew the doctorate was a EDD, it wasn't a Ph.D.
16 and an EDD is practical. Ah, you -- I did a case
17 study and it involved Tinian High School and the ah,
18 overhaul at Tinian High School and incorporating ah,
19 computer technology, doing instructional technology
20 theme throughout the school in computers in the
21 classrooms, ah and I was written up several times by
22 the media because of all the innovative programs we
23 had. Every classroom had computers. I introduced I
24 think the first they were compact disk, you know
25 large disk CD-ROM system through our science

1 programs and ah, my education involved hands-on
2 instructional technology meaning the use of
3 computers and technology, also the masters program.

4 In college, my communications was prelaw. I
5 wanted to be, go to law school, so I always tried to
6 take courses that, ah were practical and, ah were
7 geared toward survival in the real world.

8 Q And, what do you mean by that, survival in the real
9 world?

10 A Ah you know stay away from ah -- ah, meaning just
11 ah--

12 Q Let me just ask you. Do you feel like, this is
13 seeking some of your opinion on this, but do you
14 feel like the only way to survive in this world is
15 if um, if you demand people to follow the law or if
16 you demand the enforcement of laws? I mean is that
17 what you're thinking of when you say, I take prelaw
18 for my survival?

19 A No, I took communications ah, because the mentor I
20 had was a professor at UCLA explained to me that I
21 needed improvement in communications, ah speaking in
22 front of audiences. Even though I played a lot of
23 sports, I was pretty much shy, you know I had
24 problems speaking in front of, ah so he said take
25 communications ah, stage, dramatic arts, and so I --

1 the program was dramatic arts slash communications
2 and then he also encouraged me to take -- I took a
3 minor in psychology because if, ah you know learning
4 about people and if you wanna be an attorney, about
5 -- ah if I eventually became a defense attorney and
6 going to court, things like that, so it was
7 basically practical meaning take courses that would
8 help you in the next stage of your law school.

9 Q But when you were getting your undergraduate degree
10 in communications, had you at that stage ever filed
11 any litigation or complaints against anybody?

12 A In college? Um, I filed on a brake job in Small
13 Claims and won and, that was about it.

14 Q And how old were you when you did that?

15 A Twenties?

16 Q Was that just a car repair that was bad?

17 A They said they did a complete brake job on my
18 vehicle and I worked at a gas station so I took it
19 back to the station and the brake seem a little
20 spongy so I popped the wheels off and they were
21 still the old brakes. So, I took photographs and
22 had my supervisor attest to it and, ah put into
23 small claims and--

24 Q Was that your first experience with filing a
25 complaint or filing a grievance against....

1 A Yes.

2 Qanybody else? What year was that? Do you
3 recall?

4 A Huh. Early -- maybe early '70s? Maybe about 24,
5 25.

6 Q Okay, um was that success there some of the reason
7 that you wanted to go into law school?

8 A I just wanted a brake job. I wrote and, you know I
9 did that first. I just wrote them and said could
10 you please put new brakes on and they um basically
11 told me to, you know jump off the bridge.

12 Q But did you actually have to go to a hearing on
13 that?

14 A Yes.

15 Q In the courtroom?

16 A San Fernando Courthouse, yes.

17 Q And, you considered that a good experience? Or, I
18 mean did you feel like that was a positive
19 experience?

20 A Really, nobody likes to go to court, I tried to
21 settle it, you know through correspondence and they
22 refused and my uncle encouraged me to file small
23 claims, that's when I found out that I could file
24 and so I did and, ah I prevailed, and I was just
25 happy to get my car fixed at the time.

1 Q Yeah. I don't blame you. Okay, um I'd like to just
2 deal with some of your employment background based
3 on what you've already told us. I've heard that you
4 worked at a gas station, I've heard that you had
5 your own construction company, can you just kind of
6 run me through your ah, employment background from
7 the time you graduated from high school?

8 A Well, from high school, um I went to Standard
9 Stations, Incorporated. This company operated a
10 chain of service stations in Southern California,
11 and I worked there on and off for about nine years.
12 MR. SMITH: Okay.

13 A Until after I, ah graduated from San Diego State, I
14 remember putting my diploma in a lube room in still
15 freezing night shift and then, ah--

16 Q What did you do there?

17 A I -- a service station attendant.

18 MR. SMITH: Okay.

19 A And, ah the back room, ah minor mechanical, tune
20 ups, ah lube jobs, oil changes, things like that.
21 And when I was in the lube room one night there was
22 with my degree on the wall, my friend came in and,
23 Chuck Hollman said he'd give me a job at Sperry
24 Univac as a--

25 Q How do you spell that one?

1 A Sperry Univac? S-P-E-R-R-Y Univac? Defense
2 contractor? Did the Estrea (ph.) Viking?
3 Antisubmarine warfare plane for the Navy?

4 Q Where are they out of?

5 A They were based in Minnesota and they had off, ah
6 sites throughout the United States.

7 Q Including California?

8 A Yes.

9 MR. SMITH: Okay.

10 A And--

11 Q So did you go work for them?

12 A Yes, I went to interview and, ah was picked to be a
13 tech writer, technical writer.

14 Q And, at this point you already had your
15 communications degree, correct?

16 A Yes.

17 Q Okay. And, how long did you work with them?

18 A Two, approximately two years.

19 Q Doing tech writing?

20 A Yes, I did proposals, tech writing. Ah, they kind
21 of appointed me as special projects, people would
22 come in and I would -- and I designed, ah
23 advertising? One of my designs was used by the
24 company nation wide.

25 MR. SMITH: Cool.

1 A It was nice to see in the magazine. Then, ah I was
2 writing too, into tech writing, plus writing the
3 screen play. Um, at this time I was meeting some
4 people. I lived near the studios and, ah you know
5 everybody is writing screen plays, you know who live
6 that area, so it was an enjoyable past time, I was
7 trying to make ah -- but doing it, you know is a
8 challenge and then I went to Tahiti and that changed
9 me to look towards ah -- ah the islands, see if I
10 could live on the islands--

11 Q When was that that you went, that you--

12 A About '74? But I came back from Tahiti but I then
13 went into ah, a variety of jobs because I, ah was
14 interested in art, paintings and what not, and I ah
15 sold some paintings for people on the road so to
16 speak, you go to shopping malls on weekends, and
17 became a messenger. I was a messenger in Hollywood,
18 ABC messenger at the time during the week. And, was
19 a pool cleaner, I clean pools, ah for Hollywood, you
20 know for the stars. I guess I was a little bit--

21 Q What was the company you worked for?

22 A The company was, ah -- it was located near ah -- ah
23 Century City? Some place?

24 MR. SMITH: Okay.

25 A And they specialized in the wealthy and the movie

1 stars and ah--

2 Q Did you clean anybody's really fun -- any really

3 famous people's pools?

4 A Yes. Yeah, it was quite--

5 Q Do you remember any of them?

6 A Ah Dorothy McGuire, ah really an old time actress.

7 MR. SMITH: Yeah.

8 A Ah the bold headed guy. A funny, ah--

9 Q Kojak?

10 A No. Ah he played Frankenstein in an old movie.

11 That's comedy Frankenstein, I forget his name.

12 Q The one that's on Everyone Loves Raymond?

13 A Yeah, he plays like the father, something like that?

14 A Peter Broil (ph.)? Something like that?

15 Q Yeah, yeah, that guy. Ah, and then I did the pools

16 first, and then it's messengers after that because

17 we would meet, all the delivery people would meet at

18 these, ah drive through restaurants? You know for

19 lunch? And you'd meet the messengers, the pool

20 cleaners, gardeners, and after talking to the

21 messenger service guys, I said that it seem like a

22 better pay and a nicer job, so the guy I met he got

23 me, you know into the messenger service. So, I

24 changed from going to the back doors of the

25 Hollywood mansions to the front doors because that's

1 where I met a ton of famous people, is in the
2 messenger service because I ah--

3 Q What did you do, what was your job?

4 A He delivered ah, important documents? Like when
5 they bought homes? He delivered deals between
6 studios and movie stars.

7 Q You actually worked for the network ABC?

8 A No, it was ABC messenger service. They just
9 capitalized on I believe the ABC station.

10 Q So, it was the independent company that did this?

11 A Yeah. Yeah, delivered.

12 MR. SMITH: Okay.

13 A And they were the top rated company in the LA area,
14 so you get all the good calls so to speak, and you
15 work your way up into the, ah through system and
16 once you got confidence with the company, they gave
17 the real confidential calls, which I eventually did.
18 So, that was quite exciting because you had to go
19 into closed sets and, because you -- we had to have,
20 there was like a trust factor?

21 MR. SMITH: Huh.

22 A Because you couldn't reveal certain things you'd see
23 in the closed sets? That shouldn't -- the public
24 shouldn't know about? You have to keep because if
25 they find out, then you'd lose your job, so.